

1 Jeffrey Willis (NV Bar #4797)  
 2 Erica J. Stutman (NV Bar #10794)  
 3 Gregory Marshall (*admitted pro hac vice*)  
 4 Jacob C. Jones (*admitted pro hac vice*)  
 5 SNELL & WILMER L.L.P.  
 6 3883 Howard Hughes Parkway, Suite 1100  
 7 Las Vegas, Nevada 89169  
 Telephone: (702) 784-5200  
 Facsimile: (702) 784-5252  
 E-Mail: [jwillis@swlaw.com](mailto:jwillis@swlaw.com)  
[estutman@swlaw.com](mailto:estutman@swlaw.com)  
[gmarshall@swlaw.com](mailto:gmarshall@swlaw.com)  
[jcjones@swlaw.com](mailto:jcjones@swlaw.com)

8 *Attorneys for Defendants Wells Fargo Bank, N.A. and*  
*Katherine Darrall*

10 IN THE UNITED STATES DISTRICT COURT  
 11 DISTRICT OF NEVADA

12 ANDREW D. ZARON, solely in his capacity as  
 13 the Court-Appointed Receiver of JAMA  
 14 INVESTMENT GROUP, INC., MAURICIO  
 15 JASSO, GUILLERMO SESMA, SYLVIA  
 16 MARTINEZ SALINAS, BELISARIO JASSO  
 BALDINI, JAVIER RAMIREZ LARES,  
 ANTONIO BACHALANI, RODRIGO  
 FERNANDEZ, JUAN ROMERO and  
 BERNARDO VILLACECIAS,

17 Plaintiffs

18 v.

19 WELL'S FARGO BANK, N.A.,  
 20 KATHERINE DARRALL, and JOSE RICO,

21 Defendants

Case No. 2:20-cv-00858-CDS-BNW

**STIPULATION AND ORDER FOR  
 EXTENSION OF TIME TO RE-FILE  
 SUMMARY JUDGMENT BRIEFS BY  
 ONE WEEK**

**[FIRST REQUEST]**

**[ECF No. 458]**

22 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiffs and  
 23 Defendants, for good cause, hereby stipulate and agree to extend the deadline for the Parties to re-  
 24 file their summary judgment briefs (as directed by the Court (*see* ECF No. 457) from January 17,  
 25 2024 to January 24, 2024, and state as follows:

26 1. On December 18, 2023, the Court held a hearing, during which the Court directed  
 27 the parties to re-file their summary judgment motions (without substantive changes) and exhibits  
 28 thereto, together with a new motion to seal and redact pertinent materials, by January 17, 2024. *See*

1 ECF 457.

2       2. The Court's Minute Entry states, "If the parties need additional time, they may file  
3 a stipulation for additional time." *See* ECF No. 457.

4       3. While the Parties have worked diligently to narrow the materials for sealing and to  
5 consolidate and simplify the arguments relating to those materials (and in view of the widely  
6 recognized intervening holidays), the Parties respectfully submit that an additional week is  
7 necessary to finalize the submissions.

8       4. The Parties submit this request is not for the purpose of delay and that it is consistent  
9 with the purposes stated in Rule 1, Federal Rules of Civil Procedure.

10       5. In light of the above, the Parties respectfully stipulate and request that the deadline  
11 for re-filing the summary judgment briefs be extended from January 17, 2024 to January 24, 2024.

12 DATED this 16<sup>th</sup> day of January, 2024.

13 **SNELL & WILMER L.L.P.**

14 /s/Erica J. Stutman

15 Jeffrey Willis (NV Bar No. 4797)  
Erica J. Stutman (NV Bar No. 10794)  
Gregory Marshall (*admitted pro hac vice*)  
Jacob C. Jones (*admitted pro hac vice*)  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169

16       *Attorneys for Defendants Wells Fargo Bank,  
N.A. and Katherine Darrall*

17 **FOX ROTHSCHILD LLP**

18 /s/Colleen E. McCarty (with permission)

19 MARK J. CONNOT (SBN 10010)  
COLLEEN E. MCCARTY (SBN 13186)  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
mconnot@foxrothschild.com  
cmccarty@foxrothschild.com

20       *Attorneys for Defendant Jose Rico*

21 **KELLEY UUSTAL, PLC**

22 /s/Courtney Caprio (with permission)

23 COURTNEY CAPRIO (*Admitted Pro Hac Vice*)  
500 N. Federal Highway, Suite 200  
Fort Lauderdale, Florida 33301  
cac@kulaw.com

24       JEFFREY W. GUTCHESS (*Admitted Pro Hac Vice*)  
JOANNA NIWOROWSKI (*Admitted Pro Hac Vice*)  
AMANDA SUAREZ (*Admitted Pro Hac Vice*)  
**AXS LAW GROUP, PLLC**  
2121 NW 2nd Avenue, Suite 201  
Miami, Florida 33127

25       Anthony P. Sgro (NV Bar No. 3811)  
Colleen N. Savage (NV Bar No. 14947)  
**SGRO & ROGER**  
720 S. 7<sup>th</sup> Street, 3rd Floor  
Las Vegas, Nevada 89101  
TSgro@SgroandRoger.com  
CSavage@SgroandRoger.com

26       *Attorneys for Plaintiffs*

27 **IT IS SO ORDERED.**

28   
UNITED STATES DISTRICT JUDGE

DATED: January 18, 2024